

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

20-cv-81205-RAR

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a PAR FUNDING, *et al.*,

Defendants.

**DEFENDANTS' MOTION TO ENLARGE PAGE LIMIT TO
RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Defendants Lisa McElhone, Joseph Cole Barleta, Joseph W. LaForte, Dean Vagnozzi, Perry Abbonizio, Michael Furman and Relief Defendant The LME 2017 Family Trust (collectively, "Defendants"), move this Honorable Court to enlarge the page limit for their Joint Response to Plaintiff's Amended Complaint for Injunctive and Other Relief. In support, Defendants state as follows:

1. On October 24, 2020, Defendants filed an Amended Motion for Enlargement of Time to Respond to the Amended Complaint. ("Complaint"). In their amended motion, Defendants explained that they needed additional time to coordinate their filings to avoid duplicating arguments. (DE 346).
2. The Court granted the Amended Motion and ordered Defendants to file a single Response (or separate Answers) to the Amended Complaint no later than November 2, 2020. (DE 347).

3. As a consequence, Defendants will be filing a joint motion to dismiss, in which they will each address issues pertinent to their clients while consolidating their arguments into a single motion.
4. Counsel for Defendants are working diligently to do so as efficiently and succinctly as possible, but due to the breadth of the Amended Complaint and complexity of the various issues that must be addressed in a joint motion, Defendants require an additional ten (10) pages for their joint response.
5. The filing of a single response rather than several independent motions will significantly reduce the number of pages filed and, as a consequence, conserve court resources, even considering the additional pages requested herein.

WHEREFORE, Defendants respectfully request that this Court grant their Motion and allow them an additional ten (10) pages in addition to the twenty (20) pages permitted by local rule to jointly respond to Plaintiff's Amended Complaint.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has attempted to confer with the parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issues. The undersigned has attempted to confer with counsel for the SEC, but has yet to receive a response.

Respectfully submitted,

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**[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION FOR
ENLARGEMENT OF PAGE LIMIT**

THIS CAUSE having come before the Court on Defendants' Motion for Enlargement of Page Limit (DE __) to Respond to Plaintiff's Amended Complaint, the Court having reviewed the Motion and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that the Motion is hereby GRANTED. The Defendants are permitted an additional ten (10) pages beyond the twenty (20) pages permitted by local rule for their Joint Response Plaintiff's Amended Complaint.

DONE AND ORDERED in Chambers in the United States District Court, Southern District of Florida, this day of October __, 2020.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record via ECF